

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In Re: Elaine Riebow :
Debtor : Chapter 13
: No. 24-12007
:

RESPONSE TO TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Easter District of Pennsylvania, Debtor Elaine Riebow, by and through her Attorney, Everett Cook, Esq., hereby responds to the Trustee's Motion to Dismiss and in support thereof hereby avers the following:

1. Admitted
2. Admitted
3. Denied. By way of further answer Debtor will submit an amended plan and become current on payments prior to the hearing date

WHEREFORE Debtor prays this Honorable Court Deny Trustee's motion to dismiss for failure to make plan payments.

Date: 10-3-2024

Respectfully Submitted,

/s/ Everett Cook, Esq.
Everett Cook, Esq.
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